

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

FIRST PIONEER FARM CREDIT
Plaintiff

v.

FIRST PIONEER CREDIT UNION
Defendants

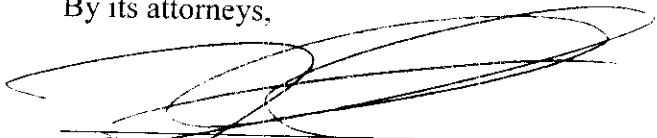
CIVIL ACTION NO. 04-12508 GAO

**JOINT MOTION TO CONVERT THE PLAINTIFF'S MOTION FOR PRELIMINARY
INJUNCTION TO A MOTION FOR PERMANENT INJUNCTION, TO CONTINUE
THE JANUARY 5, 2005 PRELIMINARY INJUNCTION HEARING AND TO CONVENE
A RULE 16 CONFERENCE ON JANUARY 5, 2005 TO SET AN EXPEDITED
DISCOVERY SCHEDULE AND FINAL HEARING DATE**

The parties respectfully request that this Court convert the plaintiff's motion for preliminary injunction to a motion for permanent injunction. The parties further request that the Court convene a Rule 16 conference in lieu of the Preliminary Injunction Hearing scheduled for January 5, 2005. As grounds for this motion the parties state that an expedited final resolution of the equitable claims is in the best interest of both parties.

Respectfully submitted,
FIRST PIONEER CREDIT UNION

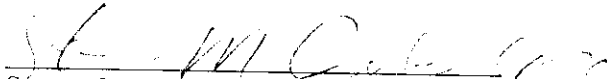
By its attorneys,



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FIRST PIONEER FARM CREDIT

By its attorney,


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Dated: December 23, 2004

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the above document was served upon all counsel of record by first class mail this 23rd day of December 2004.

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